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Gulf+Western Industries, Inc.

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1 GULF+WESTERN PLAZA NEW YORK, N. Y. 10023 212-333-4940

DEPARTMENT OF July 1, 1983

ROBERT L. JONES SENIOR VICE PRESIDENT RESIDENT COUNSEL

Ronald Kolpa

RECORD COPY

File Name H.W. Facility File / Eagle Signator ders Initials Par

Hazardous Waste Program Coordinator Dept. of Environmental Quality

Henry A. Wallace Bldg.

900 East Grand Street, 3rd Floor

Des Moines, Iowa 50319

Re: EPA STANDARDS APPLICABLE TO OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES: CORPORATE GUARANTEE OF CLOSURE AND POST-CLOSURE CARE

Dear Mr. Kolpa:

Enclosed are the following documents furnished to you in accordance with the EPA regulations regarding Gulf & Western Manufacturing Company's obligation to provide financial assurance that, at such time as any of the affected facilities close, sufficient funds will be available to insure that all hazardous waste on-site will be removed or disposed of in accordance with the regulations:

- Corporate Guarantee by Gulf & Western Industries, Inc.
 of the obligations of its subsidiary, Gulf & Western
 Manufacturing Company.
- 2. Letter from the Chief Financial Officer of Gulf & Western Industries, Inc., Mr. Michael S. Hope.
- 3. Report from Gulf & Western Industries, Inc.'s independent auditors, Ernst & Whinney.
- 4. Annual report of Gulf & Western Industries, Inc. for its most recent fully-completed year which ended July 31, 1982 and which contains copies of the certified financials of Gulf & Western Industries, Inc.

If you have any questions concerning the enclosed, please contact Mr. Michael J. Bauer, Associate Counsel, Gulf & Western Manufacturing Company, 26261 Evergreen Road, Southfield, Michigan 48037, telephone number (313) 355-8105.

RCRA

307795

Yours very truly,

Robert L. Jones

RLJ:lsk Enclosures RECEIVED

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DEPARTMENT OF WATER, AIR AND WASTE HAMAGEMENT

Dr. Ernest A. Regna, Chief Region II Grants Administration Branch 26 Federal Plaza New York, New York 10007 James H. Scarbrough, Residuals Management Branch Region IV 345 Courtland Street, N. E. Atlanta, Georgia 30308

Karl J. Klepitsch Waste Management Branch Region V 230 South Dearborn Street Chicago, Illinois 60604 Robert L. Morby, Chief Hazardous Materials Branch Region VII 324 East 11th Street Kansas City, Missouri 64106

I am the chief financial officer of Gulf & Western Industries, Inc. This letter is in support of this firm's use of the financial test to demonstrate financial asurance, as specified in Subpart H of 40 CRF Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CRF Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: None.

- 2. The firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:
- 1) FURNITURE CITY MANUFACTURING Division of Gulf & Western Manufacturing Company 2555 Oak Industrial Drive, N.E. Grand Rapids, Michigan 49505 EPA I.D. NO. MID055850200 ESTIMATED CLOSURE COST: \$165,707.00
- PURNITURE CITY MANUFACTURING Division of Gulf & Western Manufacturing Company
 33 State Street
 Middleville, Michigan 49333
 EPA I.D. NO. MID060197662
 ESTIMATED CLOSURE COST: \$13,279.00
- MICHIGAN PLATING & STAMPING Division of Gulf & Western Manufacturing Company 1860 Alpine Avenue, N.W. Grand Rapids, Michigan 49504 EPA I.D. NO. MID055850127 ESTIMATED CLOSURE COST: \$176,753.00
- G&W STAMPING Division of Gulf & Western Manufacturing Company
 90-96 Railroad Street
 Mancelona, Michigan 49659
 EPA I.D. NO. MID060178688
 ESTIMATED CLOSURE COST: \$1,229,000.00
 ESTIMATED POST-CLOSURE COST: \$12,000.00
- 5) G&W STAMPING Division of Gulf & Western Manufacturing Company
 117 South Lake Street
 East Jordan, Michigan 49727
 EPA I.D. NO. MID060178092
 ESTIMATED CLOSURE COST: \$4,550.00

- BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
 East Maumee and Wabash Railroad
 Adrian, Michigan 49221
 EPA I.D. NO. MID063705990
 ESTIMATED CLOSURE COST: \$130,405.00
 ESTIMATED POST-CLOSURE COST: \$8,330.00
- 7) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company 365 West 24th Street Holland, Michigan 49423 EPA I.D. NO. MID020899985 ESTIMATED CLOSURE COST: \$42,600.00 ESTIMATED POST-CLOSURE COST: \$14,000.00
- 8) COLLYER INSULATED WIRE Division of Gulf & Western Manufacturing Company 100 Higginson Avenue Lincoln, Rhode Island 02865 EPA I.D. NO. RID051507648 ESTIMATED CLOSURE COST: \$2,500.00
- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Pars 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:
- TAYLOR FORGE Division of Gulf & Western Manufacturing Company
 4735 West 14th Street
 Cicero, Illinois 60650
 EPA I. D. NO. ILD043905504
 ESTIMATED CLOSURE COST: \$7,180.00

- 2) BOHN HEAT TRANSFER Division of Gulf & Western Manufacturing Company
 1625 East Voorhees Street
 Danville, Illinois 61832
 EPA I.D. NO. ILD065247355
 ESTIMATED CLOSURE COST: \$1,657.00
- 3) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company
 925 Lake Street
 Baraboo, Wisconsin 53913
 EPA I.D. NO. WID023146558
 ESTIMATED CLOSURE COST: \$2,440.00
- 4) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company 8004 Cameron Road Austin, Texas 78753 EPA I.D. NO. TXD030314618 ESTIMATED CLOSURE COST: \$2,972.00
- 5) ELCO-VARICIRCUITS Division of Gulf & Western Manufacturing Company 9268 Commerce Highway Pennsauken, New Jersey 08110 EPA I.D. NO. NJD069016954 ESTIMATED CLOSURE COST: \$4,131.00
- 6) TAYLOR FORGE STAINLESS Division of Gulf & Western Manufacturing Company Reading Road, North Branch Somerville, New Jersey 08876 EPA I.D. NO. NJD063144174 ESTIMATED CLOSURE COST: \$7,150.00
- 7) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
 Route #4, Post Office Box 387
 Greensburg, Indiana 47240
 EPA I.D. NO. IND052959640
 ESTIMATED CLOSURE COST: \$366,940.00
 ESTIMATED POST-CLOSURE COST: \$73,500.00

- 8) MORSE CUTTING TOOLS Division of Gulf & Western Manufacturing Company
 163 Pleasant Street
 New Bedford, Massachusetts 02742
 EPA I.D. NO. MAD051505683
 ESTIMATED CLOSURE COST: \$43,359.00
- 9) NORTH & JUDD Division of Gulf & Western Manufacturing Company
 699 MIddle Street
 Middletown, Connecticut 06457
 EPA I.D. NO. CTD051320372
 ESTIMATED CLOSURE COST: \$37,969.00
 ESTIMATED POST-CLOSURE COST: \$5,524.00
- 10) NORTH & JUDD Division of Gulf & Western Manufacturing Company
 56 Pameacha Avenue
 Middletown, Connecticut 06457
 EPA I.D. NO. CTD000115618
 ESTIMATED CLOSURE COST: \$2,761.00
- 11) GLASGOW INDUSTRIES Division of Gulf & Western Manufacturing Company
 1115 Cleveland Avenue
 Glasgow, Kentucky 42141
 EPA I.D. NO. KYD008964934
 ESTIMATED CLOSURE COST: \$55,567.00
- 12) TAYLOR FORGE Division of Gulf & Western Manufacturing Company
 5577 Taylor Drive
 Memphis, Tenneessee 38127
 EPA I.D. NO. TND070769831
 ESTIMATED CLOSURE COST: \$21,496.00
- 13) TAYLOR FORGE Division of Gulf & Western Manufacturing Company
 Highway 12, West Business Route
 Ackerman, Mississippi 39735
 EPA I.D. NO. MSD067116178
 ESTIMATED CLOSURE COST: \$27,617.00

- 14) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company
 736 Federal Street
 Davenport, Iowa 52803
 EPA I.D. NO. IAD051001337
 ESTIMATED CLOSURE COST: \$3,822.00
- 15) ELCO-PACIFIC Division of Gulf & Western Manufacturing Company
 2250 Park Place
 El Segundo, California 90245
 EPA I.D. NO. CAD048340699
 ESTIMATED CLOSURE COST: \$1,657.00
- 16) H. KOCH & SONS Division of Gulf & Western Manufacturing Company
 5410 East LaPalma Avenue
 Anaheim, California 92807
 EPA I.D. NO. CAD066146481
 ESTIMATED CLOSURE COST: \$11,047.00
- 4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:
- 1) ELCO HUNTINGDON Division of Gulf & Western Manufacturing Company
 Huntingdon Industrial Park
 Huntingdon, Pennsylvania 16652
 EPA I.D. NO. PAD00309461
 ESTIMATED CLOSURE COST: \$5,524.00
- 2) BONNEY FORGE Division of Gulf & Western Manufacturing Company 827-31 North Meadow Street Allentown, Pennsylvania 18105 EPA I.D. NO. PAD047354287 ESTIMATED CLOSURE COST: \$4,418.00

BONNEY FORGE Division of Gulf & Western Manufacturing Company
18th and Penn Street
Huntingdon, Pennsylvania 16652
EPA I.D. NO. PAD005381538
ESTIMATED CLOSURE COST: \$884.00

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on July 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended July 31, 1982.

THE FINANCIAL TEST

Alternative I

1.	Sum of Current Closure and Post-Closure		
	Cost Estimates	\$ 2,4	86,739.00
*2.	Total Liabilities	3,670,5	42,000.00
*3.	Tangible Net Worth (Note A)	2,051,5	66,000.00
*4.	Net Worth		10,000.00
* 5.	Current Assets		05,000.00
*6.	Current Liabilities		27,000.00
* 7.	Net Working Capital (line 5 minus line 6)		78,000.00
*8.	The Sum of Net Income plus Depreciation,		
	Depletion and Amortization	288.1	70,000.00
*9.	Total Assets in United States (Note B)		00,000.00
		-,,-	,
		YES	NO
10.	Is line 3 at least \$10 million?	X	
	Is line 3 at least 6 times line 1?	X	
	Is line 7 at least 6 times line 1?	X	
	Are at least 90% of firm's assets		
	located in the United States?		
	If not, complete line 14.		X
14.	Is line 9 at least 6 times line 1?	X	
15.	Is line 2 divided by line 4 less than		
	2.0?	X	
16.	Is line 8 divided by line 2 greater		
	than 0.1?		X
17.	Is line 5 divided by line 6 greater		
•	than 1.5?	X	

Note A - Net Worth	\$2,176,710,000.00
Intangibles	< 125,144,000.00>-{See Note A of
	Annual Report
Tangible Net Worth	\$2,051,566,000.00

Note B - Includes assets in Puerto Rico.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CRF 264.151(f) as such regulations were constituted on the date shown immediately below.

MICHAEL S. HOPE

Executive Vice President

GULF & WESTERN INDUSTRIES, INC.

August 12, 1983 (DATE)

- Note 1: Some facilities listed in paragraph 4. of this letter are located in states which are now in the process of implementing their own financial assurance requirements. As these requirements are finalized, the appropriate filings will be made with the state agencies.
- Note 2: All of the calculations in The Financial Test are based on the numbers reported by the Company for its fiscal year ending July 31, 1982 and as reported in its 1982 Annual Report to Stockholders and do not include any adjustments for earnings, losses or other transactions since such date.
- Note 3: Although fiscal year 1983 of the Company has been completed technically, the annual report and the financial data will not be completed until some time later in the year and a new filing for such year will be made at that time.

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DEPARTMENT OF WATER, AIR AND WATER, AIR AND WASTE HANAGEMENT

CORPORATE GUARANTEE FOR CLOSURE

OR

POST-CLOSURE CARE

Guarantee made this 12 day of August, 1983 by Gulf & Western Industries, Inc., a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary Gulf & Western Manufacturing Company of 26261 Evergreen Road, Southfield, Michigan 48037.

Recitals:

- 1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
- 2. Gulf & Western Manufacturing Company owns or operates the following hazardous waste management facilities covered by this guarantee: See attached list.
- 3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.

- 4. For value received from Gulf & Western Manufacturing Company, guarantor guarantees to EPA that in the event that Gulf & Western Manufacturing Company fails to perform "closure and post-closure care of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR parts 264 and 265.
- year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrators for the Regions in which the facilities are located and to Gulf & Western Manufacturing Company that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Gulf & Western Manufacturing Company. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Gulf & Western Manufacturing Company has done so.

- Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U. S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
- 7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Gulf & Western Manufacturing Company unless Gulf & Western Manufacturing Company has done so.
- 8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: Amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

- 9. Guarantor agrees to remain bound under this guarantee for so long as Gulf & Western Manufacturing Company must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrators for the Regions in which the facilities are located and to Gulf & Western Manufacturing Company, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Gulf & Western Manufacturing Company as evidenced by the return receipts.
- 10. Guarantor agrees that if Gulf & Western Manufacturing Company fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrators within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Gulf & Western Manufacturing Company.

Guarantor expressly waives notice of acceptance of 11. this guarantee by the EPA or by Gulf & Western Manufacturing Company. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permits.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.

Effective Date: august 12, 1983.

GULF & WESTERN INDUSTRIES, INC.

Senior Vice President Robert L. Jones,

Resident Counsel & Secretary

Commission Expires March 30, 19.3

SCHEDULE OF EPA REGION I LOCATIONS

NAME, LOCATION & EPA NO.	CLOSURE COST	POST-CLOSURE COST
COLLYER INSULATED WIRE 100 Higginson Avenue Lincoln, Rhode Island 028 EPA ID NO. RID051507648	\$ 2,500.00	
MORSE CUTTING TOOLS 163 Pleasant Street New Bedford, Massachusetts EPA ID NO. MAD051505683	\$43,359.00 6 02742	
NORTH & JUDD 699 Middle Street Middletown, Connecticut C EPA ID NO. CTD051320372	\$37,969.00 06457	\$ 5,524.00
WILCOX-CRITTENDON (NORTH & 56 Pameacha Avenue Middletown, Connecticut CEPA ID NO. CTD000115618		
	\$86,589.00	\$ 5,524.00

SCHEDULE OF EPA REGION II LOCATIONS

NAME, LOCATION & EPA NO.	CLOSURE COST	POST-CLOSURE COST
ELCO-VARICIRCUITS 9268 Commerce Highway Pennsauken, New Jersey 08110 EPA ID NO. NJD069016954	\$ 4,131.00	
TAYLOR FORGE STAINLESS Reading Road, North Branch Sommerville, New Jersey 08876 EPA ID NO. NJD063144174	\$ 7,150.00	
	\$11,281.00	

SCHEDULE OF EPA REGION III LOCATIONS

NAME, LOCATION &		
EPA NO.	CLOSURE COST	POST-CLOSURE COST
ELCO-HUNTINGDON	\$ 5,524.00	
Huntingdon Industrial Park		
Huntingdon, Pennsylvania 16652		
EPA ID NO. PAD00309461		
BONNEY FORGE DIVISION	\$ 4,418.00	
827-31 North Meadow Street	A 41410.00	
Allentown, Pennsylvania 18105		
EPA ID NO. PAD047354287		
BONNEY FORGE DIVISION-HUNTINGDON	\$ 884.00	
18th and Penn Streets		
Huntingdon, Pennsylvania 16652 EPA ID NO. PAD005381538		
EPA ID NO. PADOUSSOISSO		
	\$10,826.00	
	=========	

SCHEDULE OF EPA REGION IV LOCATIONS

NAME, LOCATION & EPA NO.	CLOSURE COST	POST-CLOSURE COST
GLASGOW INDUSTRIES 1115 Cleveland Avenue Glasgow, Kentucky 42141 EPA ID NO. KYD008964934	\$55,567.00	
TAYLOR FORGE (WOODSTOCK) 5577 Taylor Drive Memphis, Tennessee 38127 EPA ID NO. TND070769831	\$21,496.00	
G&W TAYLOR FORGE DIVISION Highway 12, W. Business Route Ackerman, Mississippi 39735 EPA ID NO. MSD067116178	\$27,617.00	
	\$104,680.00	

SCHEDULE OF EPA REGION V LOCATIONS

NAME, LOCATION & EPA NO.		CLOSU	RE COST	POST-C	CLOSURE COS	<u>ST</u>
FURNITURE CITY MANUFACTURING 2555 Oak Ind. Drive, N. E. Grand Rapids, Michigan 49505 EPA ID NO. MID055850200		\$	165,707.	00		
FURNITURE CITY MANUFACTURING 33 State Street Middleville, Michigan 49333 EPA ID NO. MID060197662		\$	13,279.	00		
MICHIGAN PLATING & STAMPING 1860 Alpine Avenue, N.W. Grand Rapids, Michigan 49504 EPA ID NO. MID055850127		ş	176,753.	00		
G&W STAMPING DIVISION - PLANT 90-96 Railroad Street Mancelona, Michigan 49659 EPA ID NO. MID060178688	22	\$1,	229,000.	00 \$	3 12,000.00)
G&W STAMPING DIVISION - PLANT 117 South Lake Street East Jordan, Michigan 49727 EPA ID NO. MID060178092	23	\$	4,550.	00		
TAYLOR FORGE 4735 West 14th Street Cicero, Illinois 60650 EPA ID NO. ILD043905504		\$	7,180.	00		
BOHN ALUMINUM & BRASS - PLANT 1625 East Voorhees Street Danville, Illinois 61832 EPA ID NO. ILD065247355	7	\$	1,657.	00		

NAME, LOCATION & EPA NO.	CLOSURE COST POST	r-CLOSURE COST
EAGLE SIGNAL DIVISION 925 Lake Street Baraboo, Wisconsin 53913 EPA ID NO. WID023146558	\$ 2,440.00	
BOHN ALUMINUM & BRASS - PLANT 13 East Maumee and Walbash Railroad Adrian, Michigan 49221 EPA ID NO. MID063705990	\$ 130,405.00	\$ 8,330.00
BOHN ALUMINUM & BRASS - PLANT 15 Route 4, P. O. Box 387 Greensburg, Indiana 47240 EPA ID NO. IND052959640	\$ 366,940.00	\$ 73,500.00
BOHN ALUMINUM & BRASS - PLANT 16 365 West 24th Street Holland, Michigan 49423 EPA ID NO. MID020899985	\$ 42,600.00	\$ 14,000.00
	\$2,140,511.00	\$107,830.00

SCHEDULE OF EPA REGION VI LOCATIONS

NAME, LOCATION & EPA NO.	CLOSURE COST	POST-CLOSURE COST
EAGLE SIGNAL DIVISION 8004 Cameron Road Austin, Texas 78753 EPA ID NO. TXD030314618	\$ 2,972.00	
	\$ 2,972.00	

SCHEDULE OF EPA REGION VII LOCATIONS

Closure and Post Closure Costs For the 12 Months Beginning July 6, 1983

NAME, LOCATION & EPA NO.

CLOSURE COST POST-CLOSURE COST

EAGLE SIGNAL DIVISION
736 Federal Street
Davenport, Iowa 52803
EPA ID NO. IAD051001337

\$ 3,822.00

\$ 3,822.00

SCHEDULE OF EPA REGION IX LOCATIONS

NAME, LOCATION & EPA NO.	CLOSURE COST POST-CLOSURE COST
ELCO - PACIFIC DIVISION 2250 Park Place El Segundo, California 90245 EPA ID NO. CAD048340699	\$ 1,657.00
H. KOCH & SONS 5410 E. LaPalma Avenue Anaheim, California 92807 EPA ID NO. CAD066146481	\$ 11,047.00
	\$ 12,704.00